

## **REMARKS/ARGUMENTS**

The Applicant thanks the Examiner for the Office Action dated January 6, 2009.

### **Claim Rejections - 35 USC § 103**

The Applicant disagrees with the Examiner's assertion that the present claims are anticipated by the newly-cited Wellner.

In the Applicant's submission, Wellner adds nothing to present discussion of patentability that was not already discussed in respect of the previously-cited Djuknic. Both Djuknic and Wellner describe barcodes which encode an ID. Upon reading the barcode, a sensing device is able to access a webpage or multimedia content identified by the barcode.

Wellner discusses this type of interaction at column 2, lines 28-42:

For example, it is contemplated that each photograph or advertisement in a newspaper, magazine, or catalog can be accompanied by a printed bar code or alphanumeric ID. In order to retrieve the associated multimedia document, a user scans the printed ID with the scanner or pen (11), and the movie, product information, or game immediately starts to play. A variety of catalogs can be published (by the service provider or by third parties) catering to individual interests, e.g., old movies, horror films, or multi-user interactive games. Newspaper advertisements, magazines, books and pamphlets can also include these printed marks just as they now use phone numbers. Home shopping retailers can provide specialty catalogs. Distance learning applications can put printed marks into text books.

As already discussed by the Applicant, Djuknic described this type of interaction at column 7, lines 58-67:

When reading the paper-printed hyperbook 210 and encountering an image or a piece of text 212 where some background information is desired, the user points at the relevant marking 214 or 216, or scans it, with the reader 230. As an example, the scanning action reads from the marking 214 or 216 the address of a Web page located in the external document depository 270 where relevant information is stored and transmits this address along link 240 to computing device 250. Computing device 250 calls up the relevant Web page from depository 270 (e.g., a server accessed over

However, neither Wellner nor Djuknic teaches a computer system which receives "indicating data ... indicative of a position of a nib of the pen relative to the form". The barcode ID in Wellner identifies multimedia content, but does not identify a position of the nib of the pen.

Moreover, Wellner fails to teach that the position of the nib is computed using a perspective distortion observed on an imaged tag and a known geometry of pen optics.

As explained on page 30, line 26 *et seq* of the present description, the use of perspective distortion on an imaged tag enables an accurate determination of nib position. In tracking pen clicks, or movement of a pen on a page, it is important for the system to know precisely *where* the nib is positioned. Any approximations would lead to inherent inaccuracies in the system, which are highly undesirable.

Since it is generally not possible to place the nib in the field of view of an image sensor (due to interference in the optical system of the pen), there is a problem of how to determine nib position with high accuracy. Prior art optical positioning systems typically make an approximation by assuming that an imaged portion of the page corresponds with the actual nib position, and constraining the pen design so that the nib is placed as near as possible to the field of view of the image sensor. However, there will always be inherent inaccuracies in such systems.

Wellner does not provide any teaching as to how nib positions on a page may be determined with high accuracy. Indeed, Wellner does not even mention determination of a nib position on a page.

The Examiner has made references to vague passages of Wellner without specifying which passages are supposed to be relevant to which claim feature. The Applicant's analysis of the passages of Wellner identified by the Examiner has not revealed any teaching relating to the determination of the nib position of a pen.

Since Wellner fails to teach or suggest the claim limitations discussed above, it is submitted that the present invention is neither anticipated nor obvious in view of Wellner. In short, Wellner appears to be no more relevant to the present invention than the previously-cited Djuknic.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

Applicant/s:



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